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DHL EXPRESS (USA), INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ELIA CASTANEDA,
Plaintiff,

v.

DHL EXPRESS (USA), INC. dba DHL
EXPRESS, INC. and DOES ONE through
twenty, inclusive,
Defendants.

Case No. C 12-05182 (JSC)

AMENDED

**STIPULATION AND ~~[PROPOSED]~~
ORDER TO CONTINUE DEADLINES**

1 Plaintiff ELIA CASTANEDA ("Plaintiff") and Defendant DHL EXPRESS (USA), INC.
 2 ("Defendant") by and through their counsel of record herein, hereby stipulate and agree as
 3 follows:

4 WHEREAS, the Court issued a Pretrial Order on January 31, 2013, ordering the parties
 5 to, among other things, complete discovery by September 27, 2013 and disclose their final round
 6 of experts by November 8, 2013;

7 WHEREAS, the parties participated in a mediation on May 21, 2013 before Jamie
 8 Dupree, Esq. and delayed taking depositions pending the results of the mediation;

9 WHEREAS, the parties were unsuccessful in resolving the case at mediation;

10 WHEREAS, the parties have agreed to participate in a settlement conference before
 11 Magistrate Judge Nandor J. Vadas tentatively scheduled for August 28, 2013 at 2:00 p.m.;

12 WHEREAS, the parties would like to continue to delay taking depositions until after the
 13 settlement conference to increase chances of settlement by keeping costs down;

14 WHEREAS, the parties agree that continuing the current pre-trial deadlines will not
 15 prejudice any party in this case;

16 NOW, THEREFORE, THE PARTIES HEREBY STIPULATE AND AGREE to extend
 17 the following pre-trial deadlines set by the Court on January 31, 2013, as follows:

- 18 1. Close of Fact Discovery from September 27, 2013 to December 20, 2013
- 19 2. Last Day to Disclose Experts from November 8, 2013 to January 31, 2013
- 20 3. Hearing Dispositive Motions from December 12, 2013 at 9:00 a.m. to February 14,
- 21 2014 at 9:00 a.m.
- 22 4. Close of Expert Discovery from January 24, 2014 to February 27, 2014
- 23 5. Pre-trial Conference from March 6, 2014 at 8:30 a.m. to March 13, 2014 at 8:30 a.m.

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1 The parties do not propose any changes to the dates set for Jury Trial (March 24, 2014 at
2 8:30 a.m.).

3 Dated: August 15, 2013

LAW OFFICES OF STEPHEN M. MURPHY

4 By: /s/ P. Bobby Shukla
5 STEPHEN M. MURPHY
6 P. BOBBY SHUKLA
Attorneys for Plaintiff
ELIA CASTANEDA

7 Dated: August 15, 2013

LITTLER MENDELSON

9 By: /s/ Neda N. Dal Cielo
10 NEDA N. DAL CIELO
Attorneys for Defendant
11 DHL EXPRESS (USA), INC.

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13 **IT IS SO ORDERED.** Last day to hear dispositive motion: 2/13/2014. Pretrial conference is reset
14 to 3/13/2013 at 2:00 p.m.

15 Dated: August ¹⁵, 2013

16 By: Jacqueline S. Corley
JACQUELINE SCOOT CORLEY
UNITED STATES DISTRICT JUDGE